



LEGAL DIVISION

Electronic Informed Consent Perspectives from a Sponsor's Experience

Justin McCarthy

Chief Counsel, Worldwide Research & Development

Pfizer Inc.

Overview

- **Overview of REMOTE study**
- **Electronic Consent**
 - **Benefits**
 - **Challenges**
- **Lessons learned**

Pfizer REMOTE Study - Background

- **Study**: Research on Electronic Monitoring of OAB Treatment Experience (“REMOTE”)
- **Primary end point**: Compare the efficacy of Detrol® LA (tolterodine tartrate) ER to placebo in subjects with overactive bladder after 12 weeks of treatment using an innovative web-based trial design
- **Objective**: Mimic a previously completed trial to replicate the results and validate this novel approach

Pfizer REMOTE Study - Background

- **Advance FDA feedback obtained**
- **IRB Review: Western IRB & UCSF IRB**
- **Principal Investigator: Dr. Stephen Bent, UCSF**
- **Electronic Consent Platform: Mytrus, Inc.**
- **Single clinical coordinating center**
- **Open to participants from 10 states**

Pfizer REMOTE Study - Background

Innovative Approach:

- Web-based recruitment
- **Web-based consent process**
- Web-based screening
- Mobile phone based efficacy assessment (e-diary)
- Study drug delivery by overnight courier (signature receipt required)
- Interactive data capture via secure website
- Virtual site visits: patient will not attend investigator / site for visits
- Study physician /call center available 24/7 by email & phone

Pfizer REMOTE Study - Background

Enrollment Challenges:

- **Target Enrollment:** 600 patients
- **Enrollment Open:** March 3, 2011
- **Enrollment Closed:** April 15, 2012
- **Participants Screened:** 237
- **Participants Randomized:** 18
- **Participants Discontinued:** 2
- **Participants Completed:** 16

REMOTE Study - Unique Hurdles

- **Patchwork of State & Federal Requirements**
- **Local Practice of Medicine / Licensing aspects**
- **Telemedicine Laws**
- **Dispensation of Study Drug**

Electronic Consent Benefits & Challenges

Electronic Consent - Benefits

- **Potential advantages for compliance and quality**
- **Efficiency and Flexibility**
- **Ability to monitor and track subject review of consent**
- **Ability to verify/capture subject understanding via online testing**
- **Active participation in consent process by subjects potentially enhances engagement and understanding**
- **Potentially more effective in capturing subject options within consent**

Electronic Consent - Challenges

- **Development of consent platform and process is resource intensive**
- **Confirmation of subject identity/age/location**
- **Amendments to consent possibly complicated**
- **May require new areas of understanding/competency**
- **Non-standard approaches may complicate regulatory/ethics review process**
- **Inter-relationships between various state and federal requirements**

Lessons Learned

REMOTE - Lessons Learned

- **Web-based approach efficient for reaching subjects**
- **Percentage of Subjects actually enrolled was low**
- **Difficult to draw conclusions from single study**
- **Substantial up-front investment required**
- **Regulatory framework does not contemplate web-based IND research**

Questions?

